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**VIA CM/ECF**

January 22, 2025

Honorable John L. Sinatra, Jr.  
 United States District Judge  
 Robert H. Jackson United States Courthouse  
 2 Niagara Square  
 Buffalo, New York 14202

**Re: Christian et al. v. James et al. | Case No. 1:22-cv-695-JLS**

Dear Judge Sinatra:

We represent the Plaintiffs in this matter, and jointly with counsel of record for all parties, submit this status report per this Court's January 8, 2025 Order, which requested that the parties "address[] what, if anything, remains in this case and what the next steps in this Court ought to be." Dkt. No. 106, at 3.

With respect to what remains, per Dkt. No. 72, the public transportation claim remains and is currently stayed pending the Second Circuit's decision in *Frey v. Bruen*, No. 23-365, which has not yet been issued. The parties propose to submit a joint status report every 60 days advising the Court of any changes (and will advise the Court as soon as *Frey* is issued).

With respect to next steps, the parties request that the Court direct entry of final judgment on the parks claim under F.R.C.P. Rule 54(b), which would enable the parties to seek immediate appeal on an expedited schedule so that the appeal can be heard before the Second Circuit's summer recess.

Respectfully submitted,

Nicolas J. Rotsko, Esq.

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cc: Counsel of record via CMECF